

MICHELE BECKWTIH
Acting United States Attorney
ADRIAN T. KINSELLA
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
JORGE OMAR ARREDONDO-GARCIA,
GREGORIO ONTIVEROS VERDUGO,
ALBERTO NAVARRO ZAPATA, and
WILFREDO F. REYES,
Defendants.

CASE NO. 2:23-CR-0162-DAD

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: March 10, 2025
TIME: 9:30 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

1. By previous order, this matter was set for status on March 10, 2025. ECF No. 87.
 2. By this stipulation, defendants now move to continue the status conference until May 5, 2025, and to exclude time between March 10, 2025, and May 5, 2025, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

 - a) The government has represented that the discovery associated with this case includes over 100 gigabytes of discovery in electronic form, including investigative reports and related documents, surveillance video and photos, laboratory reports, wiretap intercepts from nine separate phones, and other evidence. Much of this evidence, including most of the intercepts and covert recordings, is in the Spanish language. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

1 b) Counsel for defendants desire additional time to review this discovery, review the
2 current charges, to conduct investigation and research related to the charges, to discuss potential
3 resolutions with their client, and to otherwise prepare for trial.

4 c) The government does not object to the continuance.

5 d) Based on the above-stated findings, the ends of justice served by continuing the
6 case as requested outweigh the interest of the public and the defendant in a trial within the
7 original date prescribed by the Speedy Trial Act.

8 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
9 et seq., within which trial must commence, the time period of March 10, 2025 to May 5, 2025,
10 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
11 because it results from a continuance granted by the Court at defendant's request on the basis of
12 the Court's finding that the ends of justice served by taking such action outweigh the best interest
13 of the public and the defendant in a speedy trial.

14 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
15 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
16 must commence.

17 IT IS SO STIPULATED.

19 Dated: March 3, 2025

MICHELE BECKITH
Acting United States Attorney

21 By: /s/ ADRIAN T. KINSELLA
22 ADRIAN T. KINSELLA
23 Assistant United States Attorney

24 Dated: March 3, 2025

25 /s/ J. PATRICK MCCARTHY
26 J. PATRICK MCCARTHY
27 Counsel for Defendant
28 JORGE OMAR ARREDONDO-GARCIA

Dated: March 3, 2025

/s/ DINA SANTOS
DINA SANTOS
Counsel for Defendant
GREGORIO ONTIVEROS VERDUGO

1 Dated: March 3, 2025

/s/ MARK REICHEL

MARK REICHEL

Counsel for Defendant

ALBERTO NAVARRO ZAPATA

3 Dated: March 3, 2025

/s/ MICHAEL D. LONG

MICHAEL D. LONG

Counsel for Defendant

WILFREDO REYES

7 **ORDER**

8 Pursuant to the stipulation of the parties and good cause appearing, the status conference in this
9 case scheduled for March 10, 2025 is continued to May 5, 2025, at 9:30 a.m. and time is excluded
10 between March 10, 2025, and May 5, 2025, under Local Code T4. The court notes that in its November
11 22, 2024 order continuing the case for status conference the court state that no further continuances of
12 the of the status conference in this case will be granted absent a compelling showing of good cause.
13 (Doc. No. 87 at 3.) However, the undersigned acknowledges that because of the necessity of presiding
14 over a criminal calendar on March 10, 2025, the court has had to move the March 10 Sacramento
15 calendar to March 12, 2025, and that counsel may be unavailable on the new date. **The court again**
16 **emphasizes that no further continuances of the of the status conference in this case will be granted**
17 **absent a compelling showing of good cause.**

18 IT IS SO ORDERED.

19 Dated: March 4, 2025

Dale A. Drozd

20 DALE A. DROZD

21 UNITED STATES DISTRICT JUDGE